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February 1, 2019

By ECF

Hon. Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 17A
New York, New York 10007

Re: *Carlos M. Salas et al. v. Peter Salas et al.*,
Case No. 16-cv-002248

Dear Magistrate Judge Freeman:

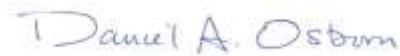
We write on behalf of defendants Peter E. Salas, Dolphin Advisors, LLC, Dolphin Asset Management Corp., Dolphin Direct Equity Partners, LP and Dolphin Management, Inc. (“Defendants”), to request an extension of time to file Defendants’ response to Plaintiffs’ proposed findings of fact and conclusions of law. This document is currently scheduled to be filed on **February 8, 2019**. Defendants respectfully request a 14-day extension of time, up to and including **February 22, 2019**, to file their document.

This is Defendants’ first request for an extension of time to file Defendants’ response to Plaintiffs’ filing. Defendants have been working on their response but submit that the additional time is necessary in order to sufficiently review and address Plaintiffs’ 75-page submission containing 393 proposed facts and conclusions; Defendants submitted 249.

Hon. Debra Freeman
February 4, 2019
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Counsel for Plaintiffs Ada Cristina Salas and Carlos M. Salas has informed Defendants' counsel that Plaintiffs do not consent to this relief. *See* E-mail dated February 2, 2019 attached hereto.

Respectfully submitted,

A handwritten signature in blue ink that reads "Daniel A. Osborn". The signature is written in a cursive, slightly slanted style.

Daniel A. Osborn

cc: Herbert Deutsch, Esq. (by ECF)
Jeremy E. Deutsch, Esq. (by ECF)
Elliot J. Coz, Esq. (by ECF)

From: [Deutsch, Herbert](#)
To: [Dan Osborn](#)
Cc: [Coz, Elliot J.](#); [Deutsch, Jeremy E.](#); [Lindsay Trust](#)
Subject: Re: Salas -- Reply Date
Date: Saturday, February 02, 2019 9:42:20 AM

We oppose your request. Replies are limited to answering and not interposing new materials. In addition you have not provided any reason why you need over a month

Sent from my iPhone

On Feb 1, 2019, at 7:55 PM, Dan Osborn <DOsborn@osbornlawpc.com> wrote:

Gentlemen – we intend to ask for additional time (until February 22) to file our responsive pleading.

Please let me know if you consent so that we can advise the court of your position.

Thank you,

Daniel

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